

Toombs County Board of Education

Dr. Kendall Brantley, Superintendent

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Lyons, GA 30436
(912) 526-3141

April 26, 2000

Director Food Distribution Division
Food and Nutrition Service
3101 Park Center Drive
Alexandria, VA 22302

To Whom It May Concern:

On behalf of the School Nutrition Program in Toombs County, I would like to comment on USDA's plan to improve the commodity program:

1. I agree with expanding the use of long-term contracts.
2. I agree with testing best-value contracts.
3. I agree that product specifications need up-dating; however, I do not want industry standards for every item. Our commodity ground beef is higher quality than the industry standard of ground beef.
4. I disagree with allowing vendors to use commercial labels on commodity items. USDA labels help schools keep better inventory and production records.
5. I agree national umbrella contracts with processors would be acceptable.
6. I strongly disagree with expanding full substitutability of commodity products. How will the school food authority know whether or not we are getting a USDA quality product?
7. My concern about the seamless commodity distribution concept is that employees are not careful about checking code numbers on cases and invoices; hence the SFA may not receive the full planned assistance level of USDA commodities.
8. I agree that we need more processing of commodities with limited demand. Trail mix and catsup are examples of processed items that would be acceptable.
9. I agree we need written hold and recall procedures.
10. I agree with reducing the duration of product holds at the school level.
11. Commodity recall reimbursement procedures should be published.
12. 13. The Georgia Department of Education's School and Community Nutrition Division, which oversees distribution of USDA commodities, does an excellent job. School Nutrition Directors do not want to communicate with

USDA directly. We want a state agency to provide information, training and service to schools. If there are state agencies with problems, USDA should address those problems directly and enforce state regulations.

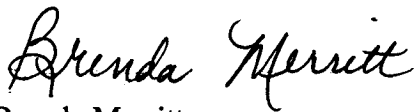
14. I agree States and partners should pilot-test improvements to the commodity program and there should be an established time frame in which the testing should be done.
15. I agree that cooperative should be encouraged, truckload requirements should relaxed (increase drops to 3) and use 4/11 funds should be facilitated for those interested in the D.O.D. Produce program.
16. I certainly agree that paperwork and reporting requirements should be streamlined.

Other considerations include approving a manageable number of pilots and listing objectives for the pilots. Conduct and impartial, independent pilot evaluation and establish control groups (States) for comparison. Evaluation results should be published on the internet.

Comments on Improvement Actions should be tabulated, identified, and categorized by each of the 16 actions. The tabulations and comment list by category should be published.

Please consider these comments. The commodity program is vital to the health and well-being of the children of this state. The National School Lunch Program needs USDA commodities in order to make nutritious, low-cost meals available. The commodity program supports American agriculture which in turn provides the food for all of us.

Sincerely,

A handwritten signature in cursive script that reads "Brenda Merritt".

Brenda Merritt
School Nutrition Director
Toombs County Schools